

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re ) Chapter 11  
W.R. GRACE & CO., et al., ) Case No. 01-01139 (JKF)  
(Jointly Administered)  
Debtors. ) Re: Docket No. 13406

**CLAIMANTS REPRESENTED BY THE LAW  
FIRM OF DIES & HILE, L.L.P.'s SUBMISSION OF  
CERTAIN EXPERT REPORTS OF WILLIAM E. LONGO,  
PH.D., WILLIAM M. EWING, CIH, AND JAMES R. MILLETTE, PH.D.  
REGARDING THE SCHEDULE FOR THE ADJUDICATION OF LACK OF  
HAZARD ISSUES, AS DESCRIBED IN THE 15<sup>TH</sup> OMNIBUS OBJECTIONS**

In accordance with the Court's Amended Order Setting Various Deadlines Regarding Objections to Asbestos Property Damage Claims, dated October 13, 2006 (D.I. 13406), Claimants represented by the Law Firm of Dies & Hile, L.L.P. (the "D&H PD Claimants")<sup>1</sup> hereby submit their Submission of Certain Expert Reports of William E. Longo, Ph.D., William M. Ewing, CIH, and James R. Millette, Ph.D. Regarding the Schedule for the Adjudication of Lack of Hazard Issues, as Described in the 15<sup>th</sup> Omnibus Objections.

I.

On December 7, 2006, the D&H PD Claimants filed their Preliminary Designation of Fact and Expert Witnesses Regarding Adjudication of Lack of Hazard Issue as described in the 15<sup>th</sup> Omnibus Objection (D.I. 13953). On December 22, 2006, the D&H PD Claimants

<sup>1</sup> The Asbestos Property Damage Claimants represented by the law firm of Dies & Hile, L.L.P., on whose behalf this Preliminary Designation of Fact and Expert Witnesses is being filed include the following: State of Arizona; State of Arkansas; State of Connecticut; State of Oklahoma; State of Oregon; City of Amarillo, Texas; City of Houston, Texas; Coleman Housing Authority; El Paso County, Texas; Harlingen Housing Authority; Sabine River Authority of Texas; City of Phoenix, Arizona; City of Tucson, Arizona; Maricopa County, Arizona; Cook County, Illinois; City of Eugene, Oregon; Eastern Oregon University; Oregon Health & Science University; Oregon State University; Portland State University; Southern Oregon University; University of Oregon; Western Oregon University; Six Hundred Building Ltd.; BNC Forum LP Texas Limited Partnership; and EPEC Realty, Inc.

filed their Supplemental Designation of Fact and Expert Witnesses Regarding Adjudication of Lack of Hazard Issue as Described in the 15<sup>th</sup> Omnibus Objection (D.I. 14155). In these pleadings the D&H PD Claimants identified expert and fact witnesses for the lack of hazard adjudication phase, and the subject matter of their testimony. The D&H PD Claimants hereby fully incorporate by reference all matters set forth therein in their Preliminary and Supplemental Designation of Fact and Expert Witnesses, including the exhibits and attachments.

## II.

The D&H PD Claimants Counsel has filed with the proof of claim for the City of Tucson, Civic Center Complex Music Hall (Claim No. 5648) the Expert Report of William E. Longo, Ph.D., Prepared on Behalf of the Property Damage Asbestos Claimants Represented by the Law Firm of Dies & Hile, LLP dated October 25, 2006 (the "Longo October 25, 2006 Expert Report"), and in certain other proofs of claim a Summary of such Expert Report incorporating by reference the full Report. The D&H PD Claimants hereby incorporate by reference the Longo October 25, 2006 Expert Report in its entirety including all backup documentation which has been filed in the above described claim file. The Longo October 25, 2006 Expert Report has previously been produced to the Debtors in connection with the "Methodology Adjudication Phase" on October 25, 2006 and on December 29, 2006. The D&H PD Claimants herewith file their Submission of the Longo October 25, 2006 Expert Report as set forth in the Summary of such Report attached hereto as Exhibit A

## III.

The D&H PD Claimants Counsel has filed with the proofs of claims for each of the Arizona building claims<sup>2</sup> the “Arizona Buildings Inspection Report” prepared by William M. Ewing, CIH, Compass Environmental, Inc., dated November 30, 2006 (the “Ewing November 30, 2006 Expert Report”). As its Submission of the Ewing November 30, 2006 Expert Report, the D&H PD Claimants herewith incorporate by reference the entire report which was filed in the proof of claim files for each building listed in footnote 2. Nevertheless, a copy of the Ewing November 30, 2006 Expert Report will be provided to counsel for the Debtors upon request. The D&H PD Claimants herewith file their Submission of the Ewing November 30, 2006 Expert Report as set forth in the Summary of such Report attached hereto as Exhibit B.

## IV.

The D&H PD Claimants Counsel has filed or intends to file with the proof of claim for the City of Tucson, Civic Center Complex Music Hall (Claim No. 5648) the Report of Results: MVA6504, Asbestos Fibers Released from Monokote prepared by James R. Millette, Ph.D., dated October 25, 2006 (the “Millette October 25, 2006 Report”). As its Submission of the Millette October 25, 2006 Report, the D&H PD Claimants herewith incorporate by reference the entire report which was filed or will be filed in the proof of claim for the City of Tucson, Civic Center Complex Music Hall, and other claims. Nevertheless, a copy of the Millette October 25, 2006 Report will be provided to counsel for

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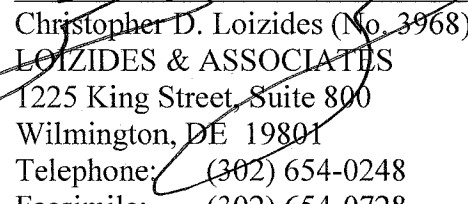
<sup>2</sup> See the following claims: City of Phoenix, Civic Plaza – Claim No. 5654; City of Phoenix, Symphony Hall – Claim No. 6065; Arizona State Department of Corrections – Claim No. 12694; State of Arizona, Veterans Memorial Coliseum – Claim No. 12721; Maricopa County, East Courts Building – Claim No. 6067; Maricopa County, West Courts Building – Claim No. 6073; Arizona State Hospital, General Services Building – Claim No. 12698; Tucson Civic Center Complex, Convention Building – Claim No. 5646; Tucson Civic Center Complex, Leo Rich Theater – Claim No. 5647; Tucson Civic Center Complex, Music Hall – Claim No. 5648; Tucson City Hall – Claim No. 5650.

the Debtors upon request. The D&H PD Claimants hereby file their Submission of the Millette October 25, 2006 Report as set forth in the Summary of such Report attached hereto as Exhibit C.

V.

The D&H PD Claimants reserve the right to supplement this submission with other additional expert reports and/or documentation and further reserve the right to call any other expert or fact witnesses designated by any other party in this matter.

DATED: January 5, 2007



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**SUMMARY OF EXHIBITS**

EXHIBIT A: Summary of October 25, 2006 Expert Report of William E. Longo, Ph.D.

EXHIBIT B: Summary of November 30, 2006 Expert Report of William M. Ewing, CIH

EXHIBIT C: Summary of October 25, 2006 Expert Report of James R. Millette, Ph.D.